

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

JONATHAN R., <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	<b>Case No. 3:19-cv-00710</b>
	)	
	)	
JIM JUSTICE, <i>et al.</i>	)	
	)	
<i>Defendants.</i>	)	

**STIPULATION**

Pursuant to Local Rule 11.2, Defendants and Plaintiffs in the above-captioned matter (collectively, “the Parties”) hereby enter the stipulations set forth below.

1. The Parties stipulate and agree that they waived, and need not supplement, initial disclosures otherwise required under Federal Rule of Civil Procedure 26(a)(1).
2. The Parties stipulate and agree that Defendants will not produce and/or submit to the Court any sampled-child specific Documents responsive to Plaintiffs’ Tenth Request for Production produced after March 11, 2024 .
3. For documents other than e-mail communication and those described in paragraph 2, the Parties stipulate and agree that Defendants do not need to produce, and may not rely on in connection with expert reports, trial, and/or any motions practice, any documents created on or after July 17, 2024. The Parties stipulate and agree that Defendants will complete their supplemental production of documents by August 20, 2024.

Respectfully submitted,

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May 29, 2024

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

**JONATHAN R., *et al.*,**

***Plaintiffs,***

**v.**

**JIM JUSTICE, in his official capacity as  
Governor of West Virginia, *et al.*,**

**Case No. 3:19-cv-00710**

***Defendants.***

**CERTIFICATE OF SERVICE**

I, Philip J. Peisch, hereby certify that on May 29, 2024, I electronically filed this Certificate of Service for the above and foregoing Stipulation via ECF, and caused a true and correct copy of to be delivered to the following via electronic mail:

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May 29, 2024

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